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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE

RONALD KOONS; NICHOLAS GAUDIO;
JEFFREY M. MULLER; SECOND
AMENDMENT FOUNDATION;
FIREARMS POLICY COALITION, INC.;
COALITION OF NEW JERSEY FIREARM
OWNERS; and NEW JERSEY SECOND
AMENDMENT SOCIETY,

Plaintiffs,

v.

WILLIAM REYNOLDS in his official
capacity as the Prosecutor of Atlantic
County, New Jersey; GRACE C.
MACAULAY in her official capacity as the
Prosecutor of Camden County, New Jersey;
ANNEMARIE TAGGART in her official
capacity as the Prosecutor of Sussex County,
New Jersey; MATTHEW J. PLATKIN, in
his official capacity as Attorney General of

Hon. Renée Marie Bumb, U.S.D.J.
Hon. Elizabeth A. Pascal, U.S.M.J.

Docket No. 22-CV-7464

*Attorney Declaration of Angela Cai
In Support of State Defendants'
Opposition to Motion for Temporary
Restraining Order*

the State of New Jersey; and PATRICK CALLAHAN, in his official capacity as Superintendent of the New Jersey State Police,

Defendants.

I, ANGELA CAI, of full age, hereby declare as follows:

1. I am employed as Deputy Solicitor General by the State of New Jersey, Department of Law and Public Safety, Division of Law. I provide this Declaration in support of State Defendants' Opposition to Plaintiffs' Motion for a Temporary Restraining Order.

2. Attached to this Declaration are true and accurate copies of the following Exhibits referenced in the State Defendants' Opposition Brief:

1. P.L. 2022 ch. 131, A4769/S3124, An Act concerning the sale and possession of firearms and supplementing and amending various parts of the statutory law.
2. Compilation of:
 - a. Order, D.E. 41, *Christian v. Nigrelli*, No. 22-2987 (2d Cir. Dec. 12, 2022);
 - b. Order, D.E. 75, *Antonyuk v. Hochul*, No. 22-2908 (2d Cir. Dec. 7, 2022);
 - c. Order, D.E. 53, *Hardaway v. Nigrelli*, No. 22-2933 (2d Cir. Dec. 7, 2022).
3. Transcript of Preliminary Injunction Hearing, *Corbett v. Hochul*, 1:22-cv-5867-LGS (S.D.N.Y. Nov. 29, 2022).
4. 63 Proceedings and Acts of the Maryland General Assembly 338, § 5 (June 15-July 3, 1773).

5. 1870 Tex. Gen. Laws 63.
6. 1786 Va. Laws 25.
7. Gen. Digest of the Ordinances & Res. of the Corp. of New Orleans 371 (1831).
8. 1869-70 Tenn. Pub. Acts 23.
9. Art. 320, Tex. Act of April 12, 1871.
10. Mo. Rev. Stat. 1879, at 224 (§ 1274).
11. 1859 Conn. Acts 62, ch. 82, § 5.
12. 1867 Kans. Sess. Laws 25.
13. 1771 N.J. Laws 346, §1.
14. 1865 La. Extra Acts 14, No. 10 § 1.
15. 1876 Iowa Acts 142, ch. 148, § 1.
16. 1929 Iowa Acts 90, § 30.
17. 1919 Me. Laws 193.
18. Ark. Rev. Stat. § 13, p. 280 (1838).
19. 1839 Ala. Acts no. 77, § 1.
20. 1821 Tenn. Acts ch. 13, § 1.
21. Ian Ayres & Spurthi Jonnalagadda, Guests with Guns: Public Support for “No Carry” Defaults on Private Land, 48 J. L. Medicine & Ethics 183, Table A4 (2020).

I declare that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

By: /s/ Angela Cai
Angela Cai
Deputy Solicitor General

December 30, 2022